

Exhibit “C”

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Attorneys for Plaintiff Trevor Moss

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TREVOR MOSS,

Plaintiff,

v.

TIBERON MINERALS LTD.,

Defendant.

Case No.: C 07-2732- SC

**PLAINTIFF'S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT TIBERON MINERALS
LTD.**

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PROPOUNDING PARTY: Plaintiff TREVOR MOSS
RESPONDING PARTY: Defendant TIBERON MINERALS LTD.
SET NO.: ONE (1)

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Federal Rule of Civil Procedure, Rule 34, plaintiff Trevor Moss requests that defendant Tiberon Minerals Ltd. or any successor entity ("Tiberon") identify and produce for inspection and copying each document or thing described in the below-numbered categories. The production and inspection shall take place at 10:00 a.m. on Monday, November 26, 2007 at the law offices of Craigie, McCarthy & Clow, 540 Pacific Avenue, San Francisco, CA 94133 or at such other time and place or in such other manner as agreed upon by counsel for the parties.

DOCUMENTS OR THINGS TO BE PRODUCED

REQUEST NO. 1: Any and all of the "official records, e.g., board minutes, compensation committee minutes" referenced in Paragraph 1 of the Declaration of Steven J. Cresswell in Support of Motion to Dismiss for *Forum Non Conveniens*.

REQUEST NO. 2: Any and all of the "records of minutes" referenced in Paragraph 2 of the Declaration of Steven J. Cresswell in Support of Motion to Dismiss for *Forum Non Conveniens*.

REQUEST NO. 3: Any and all DOCUMENTS filed or submitted to any Canadian legal authority pertaining to Tiberon's status as a Canadian legal entity.

[For the purpose of this first set of production requests, the terms "DOCUMENT" or "DOCUMENTS" means all "writings" and "photographs" as those terms are defined in Federal Rules of Evidence, Rule 1001.]

REQUEST NO. 4: Any and all DOCUMENTS relating to PERSONS who were paid bonuses by the joint venture for services performed during calendar year 2005, only excluding, by redaction or in some other acceptable fashion, the actual amount of payment or payments made.

[For the purpose of this first set of production requests, the term "PERSON" means any natural person or sole proprietorship which contracted to provide personal services under any

1 employment or consulting agreement with the Nui Phao Mining Joint Venture Company Ltd.
2 (“Nuiphaovica” or “the joint venture”).]

3 REQUEST NO. 5: Any and all DOCUMENTS relating to PERSONS who were paid
4 bonuses by the joint venture for services performed during calendar year 2006, only excluding, by
5 redaction or in some other acceptable fashion, the actual amount of payment or payments made.

6 REQUEST NO. 6: Any and all DOCUMENTS relating to any Tiberon Compensation
7 Committee meetings from January 1, 2005 to April 30, 2007, in which payment or payments to
8 any PERSON was discussed, only excluding, by redaction or in some other acceptable fashion,
9 the actual amount of payment or payments made to any PERSON.

10 REQUEST NO. 7: Any and all DOCUMENTS relating to any criteria established for
11 the payment or payments to any PERSON during the period from January 1, 2005 to April 30,
12 2007, only excluding, by redaction or in some other acceptable fashion, the actual amount of
13 payment or payments made to any PERSON.

14 REQUEST NO. 8: Any and all DOCUMENTS identified in YOUR responses to
15 Plaintiff’s First Set of Special Interrogatories severed with this document production request.

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18 Dated: October 19, 2007

CRAIGIE, McCARTHY & CLOW

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21 By: Kristen E. Drake
22 Attorneys for Plaintiff Trevor Moss
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PROOF OF SERVICE

I, Kristen Drake, certify and declare as follows:

I am over the age of 18 years, and not a party to this action. My business address is Craigie, McCarthy & Clow, 540 Pacific Avenue, San Francisco, California 94133.

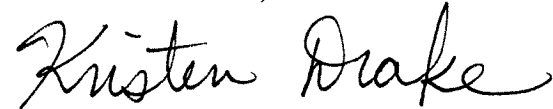
X **BY MAIL:** I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business. On October 19, 2007, at my place of business at Craigie, McCarthy & Clow, 540 Pacific Avenue, San Francisco, California 94133, I placed the document(s) described on the attached document list for deposit in the United States Postal Service in a sealed envelope, with postage fully prepaid, addressed to those persons listed in the attached service list.

_____ **BY FAX:** On October 19, 2007, I transmitted from a facsimile transmission machine, whose telephone number (415) 732-7783, the following document(s) described on the attached document list and a copy of this declaration to the recipient and their fax number as indicated on the attached service list. The transmission was reported as complete without error by a transmission report issued by the facsimile transmission machine immediately following the transmission. A true and correct copy of the transmission report may be requested from the undersigned by calling (415) 732-7788.

_____ **BY FEDERAL EXPRESS:** On October 19, 2007, I deposited in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivered to a courier or driver authorized by this express service carrier to receive documents, a copy of the document(s) described on the attached document list, together with a copy of this declaration, in an envelope designated by the this express service carrier, with delivery fees paid or provided for, addressed to those persons listed on the attached service list.

_____ **BY HAND DELIVERY:** On October 19, 2007, I caused a copy of the document(s) described on the attached document list, together with a copy of this declaration, to be hand delivered, with delivery fees paid or provided for, to those persons listed on the attached service list.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at San Francisco, California on October 19, 2007.



Kristen Drake

Document and Service Lists Attached

DOCUMENT LIST

PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT TIBERON MINERALS LTD.

SERVICE LIST

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San Francisco, CA 94111
Facsimile: (415) 989-5143
Attorneys for Defendant Tiberon Minerals Ltd.